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9 IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA

10 UNITED STATES OF AMERICA,  
11 Plaintiff,  
12 v.  
13 ADAM SHAFI,  
14 Defendant

) NO. 15 Cr. 582 WHO  
)  
) STIPULATED MOTION AND ORDER  
) SHORTENING TIME FOR MOTION  
) FOR REVIEW OF DETENTION ORDER  
)  
) Date: January 14, 2016  
) Time: 1:30 p.m.  
)  
)  
)

15  
16 PLEASE TAKE NOTICE that on January 14, 2016 at 1:30 p.m., defendant Adam  
17 Shafi will move for review of the magistrate court detention order. [Dkt. 30], which was  
18 issued earlier today. The parties have stipulated that the motion for review be made on a  
19 shortened schedule, with the defense Motion for Review of the Detention Order to be  
20 filed on or before January 8, 2016, and the government opposition to be filed on or before  
21 January 12, 2016. *See* L.R. 47-1(a)(3); 47-2(a). The parties agree that the Stipulated

22 STIPULATED MOTION  
SHORTENING TIME FOR  
REVIEW OF DETENTION ORDER  
CR 15-0582 WHO

1 Motion Shortening Time may be granted based on this stipulated motion and the  
2 declaration of counsel below, and without oral argument.

3 **Declaration of Counsel**

4 1. Along with Joshua L. Dratel, I represent Mr. Adam Shafi in the above-  
5 captioned matter and I submit this declaration in support of Mr. Shafi's Stipulated Motion  
6 Shortening Time for Motion for Review of Detention Order. I present the following  
7 based on information and belief.

8 2. On July 3, 2015, Mr. Shafi was arrested on a Complaint that alleged an  
9 attempt to provide material support to a foreign terrorist organization in violation of 18  
10 U.S.C. § 2339B. [Dkt. 1]. The Court ordered the matter sealed, [Dkt. 2], and it remained  
11 under seal in its entirety until Mr. Shafi was arraigned on an Indictment December 17,  
12 2015. [Dkt. 18].

13 3. On December 22, 2015, the magistrate court conducted a bail hearing and  
14 ordered the Mr. Shafi be detained and set the matter for status conference before this  
15 Court on January 14, 2106 at 1:30 p.m. [Dkt. 23]. On January 5, 2016, the magistrate  
16 court issued its written order detaining Mr. Shafi. [Dkt. 30]. A transcript of the detention  
17 hearing has been prepared. [Dkt. 27].

18 4. Mr. Shafi can file his motion for review of the detention order on or before  
19 January 8, 2016, and the government has agreed to file its opposition to the motion on or  
20 before January 12, 2016.

1           5. Counsel now seeks an order shortening the time provided in Local Rule 47-  
2 2(a) so that the Court can consider the Motion for Review of Detention Order at the status  
3 conference scheduled for January 14, 2016 at 1:30 p.m.

4           I declare under the penalty of perjury that the foregoing is true and correct to the  
5 best of my knowledge.

6                     Executed this 5th day of January, 2016, at Berkeley, California.

7                             s/ Erik B. Levin

8                             Erik B. Levin

9           SO STIPULATED.

10          DATED: 1/5/16

11                            BRIAN STRETCH

12                            Acting United States Attorney

13                            s/ Jeffrey Shih

14                            Jeffrey Shih, Esq.

15                            Assistant United States Attorney

16                     PURSUANT TO STIPULATION, IT IS SO ORDERED.

17          DATED: January 6, 2016

18                                       
19                                     JUDGE WILLIAM H. ORRICK